

EXHIBIT 1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
No. 25-cv-22896-KMW**

FRIENDS OF THE EVERGLADES, INC., et al.,

Plaintiffs,

v.

KRISTI NOEM, et al.,

Defendants.

DECLARATION OF JOSEPH C. HARRISON

I, Joseph C. Harrison, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct based upon my personal knowledge and review of the relevant records:

1. I am a Lieutenant Colonel and Deputy Director of the Office of Executive Officer to the Colonel of the Florida Highway Patrol (FHP). I am over 18 years of age and, if called, I could and would testify to the information provided herein.

2. I have served in FHP for over twenty years, initially as a patrol officer, and more recently as a member of FHP's leadership team. Among other responsibilities in my current role as Deputy Director, I supervise FHP's administrative functions and coordinate with federal officials to ensure FHP is supporting federal immigration enforcement to the greatest possible extent. I regularly communicate with our state troopers regarding their interactions in the field and review FHP's business records regarding arrests.

3. As Governor DeSantis detailed in Executive Order 23-03, declaring a state of emergency under Florida law, Florida is suffering an immigration crisis of unprecedented

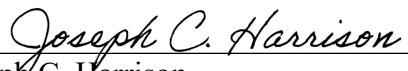
magnitude. To help alleviate this emergency, FHP has executed a “task force model” 287(g) agreement with U.S. Immigration and Customs Enforcement. That agreement allows FHP officers to perform federal immigration functions in the field. FHP’s mission—in line with both President Trump’s immigration policy and Governor DeSantis’s Executive Order—is to lawfully apprehend as many illegal aliens in Florida as possible and transmit them to ICE for removal proceedings. In 2025 alone, FHP apprehended in excess of 3,400 illegal aliens in Florida.

4. Beyond violating the nation’s immigration laws, some illegal aliens have also committed serious and violent crimes, both internal and external of the United States. FHP has apprehended such individuals, including persons accused or convicted of egregious crimes like weapons violations, armed robbery, human trafficking of a child, homicide, and more.

5. Given the estimated millions of illegal aliens residing in the country and the estimated hundreds of thousands of illegal aliens residing in Florida, it is critical that immigration officials have maximal detention space available to house illegal aliens pending deportation. Without detention, immigration enforcement is largely ineffective. Based on my experience working with FHP’s federal immigration partners, however, the increase in state and federal immigration apprehensions—necessitated by years of federal non-enforcement between 2021 and 2024—has left federal immigration detention facilities short for beds and detention space. In fact, before the detention facility at the Dade-Collier Training and Transition Airport was established, ICE regularly informed FHP officers that the federal government lacked sufficient detention capacity to detain illegal aliens intercepted by FHP. In those instances, FHP was forced to let those illegal aliens go.

6. Without sufficient beds and detention space, federal officials will be unable to hold the many illegal aliens, including criminal illegal aliens, that FHP intercepts on a routine basis, exacerbating the risk that lawbreakers will be released back into the community.

Executed on August 22, 2025, in Jackson County, Florida.



Joseph C. Harrison
Deputy Director, Executive Officer
Florida Highway Patrol